

# **EXHIBIT D**

Stowe, William

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**From:** Stowe, William  
**Sent:** Friday, December 29, 2017 5:32 PM  
**To:** Samantha Everett  
**Cc:** Leeor Neta; Jake Bernstein; Babcock, Chip; Kevin J. Curtis (kjc@winstoncashatt.com);  
docketing  
**Subject:** Re: River City v. IDG, et al.: Plaintiffs' Jurisdictional Production

Yes.

Sent from my iPhone

On Dec 29, 2017, at 4:25 PM, Samantha Everett <[samantha@newmanlaw.com](mailto:samantha@newmanlaw.com)> wrote:

William, can we schedule a call for 9am Tuesday 1/2?

Samantha

On Dec 29, 2017, at 6:27 AM, Stowe, William <[wstowe@jw.com](mailto:wstowe@jw.com)> wrote:

Leeor, I am available to meet and confer any time after 12 central today. Just let me know when. Thanks.

Sincerely,

William J. Stowe  
Jackson Walker L.L.P.  
1401 McKinney, Suite 1900  
Houston, Texas 77010  
Direct: (713) 752-4360  
Fax: (713) 308-4116  
E-Mail: [wstowe@jw.com](mailto:wstowe@jw.com)

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From: Samantha Everett [<mailto:samantha@newmanlaw.com>]  
Sent: Thursday, December 28, 2017 12:35 PM  
To: Stowe, William <[wstowe@jw.com](mailto:wstowe@jw.com)>; Leeor Neta <[Leeor@newmanlaw.com](mailto:Leeor@newmanlaw.com)>; Jake

Bernstein <[jake@newmanlaw.com](mailto:jake@newmanlaw.com)>

Cc: Babcock, Chip <[cbabcock@jw.com](mailto:cbabcock@jw.com)>; Kevin J. Curtis (<[kjc@winstoncashatt.com](mailto:kjc@winstoncashatt.com)>

<[kjc@winstoncashatt.com](mailto:kjc@winstoncashatt.com)>; docketing <[docketing@newmanlaw.com](mailto:docketing@newmanlaw.com)>

Subject: RE: River City v. IDG, et al.: Plaintiffs' Jurisdictional Production

William, Leeor refers to the attached email and letter, which was transmitted to you on December 15.

Samantha

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From: Stowe, William [<mailto:wstowe@jw.com>]

Sent: Thursday, December 28, 2017 10:12 AM

To: Leeor Neta <[Leeor@newmanlaw.com](mailto:Leeor@newmanlaw.com)>; Jake Bernstein <[jake@newmanlaw.com](mailto:jake@newmanlaw.com)>

Cc: Babcock, Chip <[cbabcock@jw.com](mailto:cbabcock@jw.com)>; Kevin J. Curtis (<[kjc@winstoncashatt.com](mailto:kjc@winstoncashatt.com)>

<[kjc@winstoncashatt.com](mailto:kjc@winstoncashatt.com)>; docketing <[docketing@newmanlaw.com](mailto:docketing@newmanlaw.com)>; Samantha

Everett <[samantha@newmanlaw.com](mailto:samantha@newmanlaw.com)>

Subject: RE: River City v. IDG, et al.: Plaintiffs' Jurisdictional Production

Would you mind sending the specific letter you are referencing? There have been a lot of emails and meet and confers over this case. I'm happy to get you a response. Thanks.

Sincerely,

William J. Stowe  
Jackson Walker L.L.P.  
1401 McKinney, Suite 1900  
Houston, Texas 77010  
Direct: (713) 752-4360  
Fax: (713) 308-4116  
E-Mail: [wstowe@jw.com](mailto:wstowe@jw.com)

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From: Leeor Neta [<mailto:Leeor@newmanlaw.com>]

Sent: Thursday, December 28, 2017 12:09 PM

To: Stowe, William <[wstowe@jw.com](mailto:wstowe@jw.com)>; Jake Bernstein <[jake@newmanlaw.com](mailto:jake@newmanlaw.com)>

Cc: Babcock, Chip <[cbabcock@jw.com](mailto:cbabcock@jw.com)>; Kevin J. Curtis (<[kjc@winstoncashatt.com](mailto:kjc@winstoncashatt.com)>

<[kjc@winstoncashatt.com](mailto:kjc@winstoncashatt.com)>; docketing <[docketing@newmanlaw.com](mailto:docketing@newmanlaw.com)>; Samantha

Everett <[samantha@newmanlaw.com](mailto:samantha@newmanlaw.com)>

Subject: Re: River City v. IDG, et al.: Plaintiffs' Jurisdictional Production

You should get documents this week.

By the way, I don't believe we received a response to our earlier meet and confer letter. Could you please advise as to when we can expect to hear back? We need to file a motion to compel within the next week if we don't hear anything..

Thanks,

Leeor

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**From:** Stowe, William <[wstowe@jw.com](mailto:wstowe@jw.com)>  
**Sent:** Thursday, December 28, 2017 6:34:43 AM  
**To:** Leeor Neta; Jake Bernstein  
**Cc:** Babcock, Chip; Kevin J. Curtis ([kjc@winstoncashatt.com](mailto:kjc@winstoncashatt.com)); docketing  
**Subject:** RE: River City v. IDG, et al.: Plaintiffs' Jurisdictional Production

Leeor: I did not receive a response regarding my below inquiry about the documents. Please let me know. Thanks.

Sincerely,  
William J. Stowe  
Jackson Walker L.L.P.  
1401 McKinney, Suite 1900  
Houston, Texas 77010  
Direct: (713) 752-4360  
Fax: (713) 308-4116  
E-Mail: [wstowe@jw.com](mailto:wstowe@jw.com)

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**From:** Leeor Neta [<mailto:Leeor@newmanlaw.com>]  
**Sent:** Wednesday, December 27, 2017 9:49 AM  
**To:** Stowe, William <[wstowe@jw.com](mailto:wstowe@jw.com)>; Jake Bernstein <[Jake@newmanlaw.com](mailto:Jake@newmanlaw.com)>  
**Cc:** Babcock, Chip <[cbabcock@jw.com](mailto:cbabcock@jw.com)>; Kevin J. Curtis ([kjc@winstoncashatt.com](mailto:kjc@winstoncashatt.com)) <[kjc@winstoncashatt.com](mailto:kjc@winstoncashatt.com)>; docketing <[docketing@newmanlaw.com](mailto:docketing@newmanlaw.com)>  
**Subject:** Re: River City v. IDG, et al.: Plaintiffs' Jurisdictional Production

Please remember to copy [docketing@newmanlaw.com](mailto:docketing@newmanlaw.com) on all communications.

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From: Stowe, William <[wstowe@jw.com](mailto:wstowe@jw.com)>  
Sent: Wednesday, December 27, 2017 7:04:55 AM  
To: Leeor Neta; Jake Bernstein  
Cc: Babcock, Chip; Kevin J. Curtis ([kjc@winstoncashatt.com](mailto:kjc@winstoncashatt.com))  
Subject: River City v. IDG, et al.: Plaintiffs' Jurisdictional Production

Leeor:

Despite you serving written responses to IDG's and CXO's jurisdictional Requests for Production (in which Plaintiffs said they will be producing documents), I do not see that they have produced any documents to date. If you have and I have missed them, will you please resend? Thanks.

Sincerely,  
William J. Stowe  
Jackson Walker L.L.P.  
1401 McKinney, Suite 1900  
Houston, Texas 77010  
Direct: (713) 752-4360  
Fax: (713) 308-4116  
E-Mail: [wstowe@jw.com](mailto:wstowe@jw.com)

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